

United States Environmental Protection Agency

Washington D.C. 20460 June 14, 2021

Office of Chemical Safety and Pollution Prevention

ECOLAB
CID LINES N.V.
201 W. VAN BUREN STREET
COLUMBIA CITY,IN 46725

Report of Analysis for Compliance with PR Notice 11-3

Thank you for your submittal of 28-MAY-21. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your data submittal was found to be partially in compliance with the standards for submission of data contained in PR Notice 11-3, with the exceptions noted below. A copy of your transmittal bibliography is enclosed, annotated with the Master Record ID's (MRIDs) assigned to each document accepted. Please use these numbers in all future references to these documents. If deficiencies were found which apply to individual accepted studies, they are listed below following the applicable MRID. Any document which has been assigned a MRID has been accepted under PR Notice 11-3. If any comments related to a MRID appear on this report, they are provided for your information and reference when preparing future submissions. Some individual documents were not acceptable, and all copies are being returned to you for correction for the reasons indicated below. These rejected studies have been assigned separate identification numbers which are annotated on both the enclosed bibliography and the rejected document labels. The rejected studies and their deficiencies are described below.

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- * A statement of compliance or non-compliance with the Good Laboratory Practices Standards contained in 40CFR160 is required for all studies (except range finding studies and supplements to previously submitted studies) submitted to EPA. This statement must appear as page 3 of all studies, and must be signed and dated by the study sponsor, the study submitter, and the study director. Please see 40 CFR 160.12 for specific guidance.
- * You must include one of the two acceptable statements of data confidentiality claims under FIFRA section 10(d)(1)(A), (B), or (C) as the second element in each study. The language of two alternative forms of the Statement of Data Confidentiality Claims, shown in Attachment 3 of PR Notice 11-3, cannot be altered. See pages 8 and 13 of the Notice.